

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: MARK ANDREW STONE
AND MEGAN THERESA STONE
DEBTORS**

* **CHAPTER 13**
* **CASE NO. 5:17-bk-01661-JJT**
*

REQUEST FOR PAYMENT OF CHAPTER 13 COMPENSATION AND EXPENSES

Instructions: Complete **Part A** for payment of the presumptively reasonable fee, as described in L.B.R. 2016-2(c), being paid through a Chapter 13 plan and reimbursement of expenses. Complete **Part B** for payment of compensation and reimbursement of expenses awarded by separate Court order. Complete **Part C** for all requests for payment of compensation and reimbursement of expenses.

A. Presumptively reasonable fees under L.B.R. 2016-2(c)	
1. Amount agreed to by debtor	\$
2. Less amount paid to attorney prior to filing petition	\$
3. Balance of compensation to be paid through plan distributions	\$
4. Expenses advanced to be paid through plan distributions: (describe expense and amount)	\$
B. Compensation and reimbursement of expenses allowed upon application and order under LBR 2016-2(a)	
1. Retainer received	\$ 810.00
2. Compensation earned prepetition and paid to attorney prior to filing petition	\$ 0.00
3. Expenses reimbursed prepetition	\$ 0.00
4. Balance in retainer after deduction of prepetition compensation and expenses	\$ 810.00
5. Compensation and expenses to be approved by the Court and to be paid through plan distributions, less balance in client trust account	\$ *See Below
C. The undersigned hereby requests payment through the plan for compensation and reimbursement of expenses under 11 U.S.C. § 503(b)(2) in the following amount based on the information above*:	

Dated: December 5, 2017

/s/ Carlo Sabatini
Attorney for Debtor

**Counsel estimates that if the full amount of his fees earned to date were paid, then the plan would be underfunded. However, after the plan is confirmed, counsel intends to file a fee application that proposes that those fees would be paid only to the extent that funds are available to pay them without underfunding the plan. Counsel reserves a right to omit from the fee application any time spent as a result of the involvement in this bankruptcy case of JPMorgan Chase Bank, N.A.; Shapiro & DeNardo, LLC; and Kevin S. Frankel, Esquire. If such time is omitted, then it may be properly included in a future fee application to be filed in connection with litigation against some or all of the aforementioned parties.